Rennaker, Joanne (DEQ)

From: Hansen, Jeff <jrhansen@lan-inc.com>
Sent: Tuesday, February 24, 2015 4:14 PM
To: Prysby, Mike (DEQ)
Subject: THM Violation
Attachments: EPA-EOR-guidance-exerpt.pdf

Mike,

You told me that when a community had a full year of samples, the full year average is used as the OEV, but I don't see that in the guidance document anywhere. The EPA guidance document seems to say that the OEV is always calculated using 3 quarts of data, with the current quarter counted twice. See attached. Am I missing something?

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1. Introduction

This chapter covers:

The Environmental Protection Agency (EPA) promulgated the Stage 2 Disinfectants and Disinfection ByProducts Rule (DBPR) in January 2006. The Stage 2 DBPR provides for increased protection against the potential risks for cancer and reproductive and developmental health effects associated with disinfection byproducts (DBP). The Stage 2 DBPR establishes maximum contaminant level goals for chloroform, monochloroacetic acid and trichloroacetic acid; maximum contaminant levels (MCLs), based on a locational running annual average (LRAA)[1], for total trihalomethanes (TTHM) and haloacetic acids (HAA5); monitoring, reporting, and public notification requirements based on the TTHM and HAA5 MCLs; and revisions to the reduced monitoring requirements for bromate. The complete Stage 2 DBPR can be found at http://www.epa.gov/safewater/disinfection/stage2/regulations.html.

The Stage 2 DBPR also establishes operational evaluation requirements that are initiated by the TTHM and HAA5 levels found during Stage 2 DBPR compliance monitoring. Compliance with Stage 2 DBPR MCLs is based on the average of four individual quarterly DBP measurements collected at a given location (i.e., LRAA). However, a system that is in compliance with the Stage 2 DBPR MCLs, based on the LRAA, at a location may still have individual (i.e., not averaged) DPB measurements at that location that exceed the Stage 2 DBPR MCLs. EPA and the Stage 2 Microbial/Disinfection Byproducts (M/DBP) Advisory Committee were concerned about these higher levels of DBPs. The Stage 2 DBBR operational evaluation requirements were established to address these concerns.

The Stage DBPR requires systems to conduct operational evaluations, initiated by the operational evaluation levels (OEL) found in Stage 2 DBPR compliance monitoring, and to submit an operational evaluation report to the State. The OELs are determined with an algorithm, described later in this section, based on Stage 2 monitoring results. The OELs initiate a comprehensive review of system operations and act as an early warning for a possible Stage 2 DBPR violation in the following quarter. This early warning allows systems to act to prevent the violation. The Stage DBPR process for initiating an operational evaluation is not based on health effects information. **The operational evaluation requirements of the Stage 2 DBPR are**

[1] The Stage 2 DBPR requires systems to meet an LRAA of 0.080 mg/L for TTHM and 0.060 mg/L for HAA5 at each compliance monitoring location (40 CFR 141.620 (d)).